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In The Matter Of:

*Allan Chiocca v. THE TOWN OF ROCKLAND,
DEIRDRE HALL, EDWARD KIMBALL, LARRY
RYAN, MICHAEL MULLEN JR., MICHAEL
O'LOUGHLIN, RICHARD PENNEY AND KARA
NYMAN,*

Susan Ide

October 1, 2021

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C.A. No. 1:19-CV-10482-WGY

ALLAN CHIOCCA

Plaintiff,

VS.

October 1, 2021

THE TOWN OF ROCKLAND,
DEIRDRE HALL, EDWARD KIMBALL,
LARRY RYAN, MICHAEL MULLEN, JR.,
MICHAEL O'LOUGHLIN, RICHARD PENNEY
AND KARA NYMAN,
Defendants.

DEPOSITION OF: SUSAN IDE

Deposition of SUSAN IDE, taken on

behalf of the Defendant Deirdre Hall in the
hereinbefore entitled action, pursuant to F.R.C.P.,
before Karen L. Vibert, a duly qualified Notary Public
in and for the State of Connecticut, held remotely for
all participants, commencing at 10:08.m., on October 1,
2021.

Karen Vibert, CT CSR No. 00064

APPEARANCES (continued)

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ALSO PRESENT:

Allan Chiocca
Deirde Hall

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STIPULATIONS

It is hereby stipulated and agreed by and among counsel for the respective parties that all formalities in connection with the taking of this deposition, including time, place, sufficiency of notice and the authority of the officer before whom it is taken may be and are waived.

It is further stipulated and agreed that objections other than as to form are reserved to the time of trial.

It is further stipulated and agreed that the reading and signing of said deposition by the witness are not waived.

It is further stipulated that the proof of the qualifications of the Notary Public before whom the deposition is being taken is hereby waived.

<p style="text-align: right;">Page 5</p> <p>(Proceedings commenced at 10:08 a.m.)</p> <p>THE COURT REPORTER: Attorney Shafran, would you like to order a copy of the transcript?</p> <p>MR. SHAFRAN: That will go through Samantha. She can tell you what we need.</p> <p>MS. HALEM: I'll order it.</p> <p>THE COURT REPORTER: Attorney Amos, would you like to order a transcript?</p> <p>MR. AMOS: Yes. Can we get a full and a mini PDF.</p> <p>THE COURT: Attorney Dunn, would you like to order a copy of the transcript?</p> <p>MS. DUNN: Yes, please. A full and mini.</p> <p>MS. CIESLAK: You know what I want, and I'll get that on behalf of Deirdre and her counsel.</p> <p>THE COURT REPORTER: Do all counsel agree to waive the in-person oath or affirmation.</p> <p>(All counsel agreed.)</p> <p>SUSAN IDE, having been first duly sworn, testified as follows:</p> <p>MR. SHAFRAN: Cindy, just before we begin, the other stipulations that we agreed to in the other depositions -- all objections except to the form of the question and motions to strike are</p>	<p style="text-align: right;">Page 7</p> <p>just took is the same oath that you would have taken in court and that you're obligated to answer truthfully today?</p> <p>A Yes.</p> <p>Q And I know we are virtual. Sometimes the audio cuts in and out. So, if you don't hear something I say, let me know and P I'll repeat it.</p> <p>A Okay.</p> <p>Q If you don't understand a question I ask, let me know and I'll try to rephrase it so that you can understand.</p> <p>A Okay.</p> <p>Q If you answer the question, I'm going to assume that you heard it and understood it.</p> <p>A Okay.</p> <p>Q We have had instances in the past where people get kicked out of the deposition, whether it's an internet connection or whatever it may be. So, if that happens, if anyone notices it, we will stop the deposition and allow that party to get back on. Okay?</p> <p>A Okay.</p> <p>Q You're doing great with verbal answers. Sometimes we get into the habit of nodding our head or shaking our head, but the court reporter can't</p>
<p style="text-align: right;">Page 6</p> <p>reserved?</p> <p>MS. CIESLAK: Yes.</p> <p>MR. AMOS: Are we also doing objection by one, objection as to all??</p> <p>MS. CIESLAK: Yes. As we have done in other depositions, an objection by any of the Town Defendants, Ms. Hall's counsel or Mr. Kimball's counsel will count as an objection for any one of those parties. Then an objection by Mr. Shafran or Ms. Halem will count for both of them.</p> <p>MR. SHAFRAN: Yes.</p> <p style="text-align: center;">DIRECT EXAMINATION</p> <p>BY MS. CIESLAK:</p> <p>Q Good morning, Ms. Ide. How are you?</p> <p>A I'm fine, thank you.</p> <p>Q My name is Cindy Cieslak. I am an attorney representing Deirdre Hall in the matter between Allan Chiocca, and Deirdre Hall, Mr. Kimball, the Town of Rockland and the board of selectmen members.</p> <p>Have you ever been deposed before?</p> <p>A No.</p> <p>Q Okay. I'll go over a few of our ground rules, just to kind of get you used to this.</p> <p>Do you understand that the oath you</p>	<p style="text-align: right;">Page 8</p> <p>take down those types of cues, and so if you can continue to answer verbally, that would be great.</p> <p>A Okay.</p> <p>Q The last one is -- and you're doing great not talking over me. I will do my best to not talk over you. That way the court reporter can take down everything we say accurately. Okay?</p> <p>A Okay.</p> <p>Q If you need a break at any time -- I don't expect this to go all that long, but you never know where we go. So, if you need a break at any time for some water or to use the restroom, just let me know and we can take a break. All that I ask is if there's a question pending, you answer it.</p> <p>A Okay.</p> <p>Q Okay. Can you tell me what your -- can you tell me, do you currently work for Rockland?</p> <p>A Yes, I do.</p> <p>Q In what position?</p> <p>A I'm the executive assistant for the board of selectmen.</p> <p>Q How long have you worked in that position?</p> <p>A Since 2014.</p> <p>Q At that point in time Mr. Chiocca was already the town administrator; is that accurate?</p>

<p>1 would he be untruthful in that statement?</p> <p>2 A Yes.</p> <p>3 Q In your opinion, did Mr. Chiocca see</p> <p>4 Ms. Hall as someone who was in his way in terms of</p> <p>5 getting business done at town hall?</p> <p>6 MR. SHAFRAN: Objection.</p> <p>7 A From what I recall, yes.</p> <p>8 BY MS. CIESLAK:</p> <p>9 Q Why do you say that?</p> <p>10 A There were times when he would leave his</p> <p>11 office when she came in.</p> <p>12 Q And this was prior to May 1st, right?</p> <p>13 A Yes.</p> <p>14 Q And I should clarify, for the record,</p> <p>15 prior to May 1st of 2018?</p> <p>16 A Yes.</p> <p>17 Q So, in your opinion, he didn't want to</p> <p>18 work with Ms. Hall on town business even before</p> <p>19 May 1st of 2018, right?</p> <p>20 A Yes.</p> <p>21 Q In your opinion, did Mr. Chiocca see</p> <p>22 Ms. Hall as a challenge to him when it came to</p> <p>23 getting town business done?</p> <p>24 MR. SHAFRAN: Objection.</p> <p>25 A Yes.</p>	<p>Page 33</p> <p>1 2018?</p> <p>2 A No.</p> <p>3 Q Okay. Ms. Ryan's notes state,</p> <p>4 "Allan Chiocca sent her the text. She was in bed</p> <p>5 because she wanted to watch the royal wedding.</p> <p>6 Said, 'Call me when you get a chance,' and the note</p> <p>7 says, 'Thought someone died.' So, that statement is</p> <p>8 not a statement you made to Ms. Ryan?</p> <p>9 A No, that could be. I remember a phone</p> <p>10 call. I just didn't remember the text.</p> <p>11 Q Okay. So, as you sit here today, you</p> <p>12 don't recall whether or not you -- whether or not</p> <p>13 Mr. Chiocca texted you on May 18 before the phone</p> <p>14 call?</p> <p>15 A Correct.</p> <p>16 Q Okay. Do you recall whether or not he</p> <p>17 called you or you called him?</p> <p>18 A I don't recall.</p> <p>19 Q Do you recall how long the phone call was?</p> <p>20 A Maybe just a few minutes.</p> <p>21 Q We have Mr. Chiocca's phone records in</p> <p>22 this case and his phone records show that at 8:28</p> <p>23 you called him and the phone call lasted six</p> <p>24 minutes. Does that sound accurate?</p> <p>25 A That could be, yes.</p>
<p>1 BY MS. CIESLAK:</p> <p>2 Q Why do you say that?</p> <p>3 A I remember they were both strong --</p> <p>4 strong-willed people, opinionated.</p> <p>5 Q Mr. Chiocca would leave his office so that</p> <p>6 he didn't have to listen to Ms. Hall's opinion?</p> <p>7 A Occasionally, yes.</p> <p>8 Q Even before May 1st of 2018?</p> <p>9 A Yes.</p> <p>10 Q And after May 1st of 2018?</p> <p>11 A I'm going to say yes.</p> <p>12 Q So, I want to discuss May 18th of 2018</p> <p>13 with you. I'll represent to you that the incident</p> <p>14 between Ms. Hall and Mr. Chiocca occurred on May 1st</p> <p>15 of 2018 into the early morning of May 2nd of 2018,</p> <p>16 and there have been some documents in this case to</p> <p>17 reflect that May 18th is a day where some town</p> <p>18 employees became aware of at least a portion of the</p> <p>19 incident. So. Do you recall May 18, 2018 in some</p> <p>20 capacity?</p> <p>21 A Yes.</p> <p>22 Q I believe you had told Regina Ryan that</p> <p>23 Mr. Chiocca texted you. Is that accurate?</p> <p>24 A No.</p> <p>25 Q Okay. Did Mr. Chiocca text you on May 18,</p>	<p>Page 34</p> <p>1 Q Tell me everything you remember</p> <p>2 Mr. Chiocca saying during that six-minute call.</p> <p>3 A I remember him saying, "The shit has hit</p> <p>4 the fan." I said, "Oh, no. What's going on?" And</p> <p>5 he repeated, "The shit has hit the fan."</p> <p>6 And I do remember he said -- no, I</p> <p>7 don't remember. I think that was probably it. I</p> <p>8 remember saying, "Oh, no." I still didn't know what</p> <p>9 was going on.</p> <p>10 Q In connection with, The shit has hit the</p> <p>11 fan -- actually, let me just ask you a different</p> <p>12 question, so strike that.</p> <p>13 Did Mr. Chiocca mention Ms. Hall's</p> <p>14 name during this six-minute phone call?</p> <p>15 A No.</p> <p>16 Q I'll report to you that Regina's notes</p> <p>17 indicate that Deirdre Hall's name was mentioned.</p> <p>18 Are her notes accurate or inaccurate?</p> <p>19 MR. SHAFRAN: Objection.</p> <p>20 A I don't recall.</p> <p>21 BY MS. CIESLAK:</p> <p>22 Q Sitting here today, you don't recall</p> <p>23 Ms. Hall's name being mentioned during the call with</p> <p>24 Mr. Chiocca?</p> <p>25 A Correct.</p>

<p>Page 49</p> <p>1 A I spoke with Marcy Birmingham.</p> <p>2 Q What did you and Ms. Birmingham discuss</p> <p>3 with each other?</p> <p>4 A We didn't know what was going on. She</p> <p>5 received a call also and pretty much we didn't have</p> <p>6 any idea what -- what was going on.</p> <p>7 Q Did Ms. Birmingham tell you what</p> <p>8 Mr. Chiocca had told her about what happened on</p> <p>9 May 1, 2018?</p> <p>10 A I don't recall what she said. I'm sure</p> <p>11 she did; but, I do not recall her exact words.</p> <p>12 Q Does it sound familiar that Ms. Birmingham</p> <p>13 had told you that Mr. Chiocca said that he needed</p> <p>14 medication to engage in sexual relations?</p> <p>15 MR. SHAFRAN: Objection.</p> <p>16 MR. AMOS: You can answer.</p> <p>17 A Yes, that sounds familiar. That sounds</p> <p>18 familiar. Something that Marcy would probably have</p> <p>19 told me.</p> <p>20 BY MS. CIESLAK:</p> <p>21 Q Okay. And it was shocking to you to hear</p> <p>22 that Mr. Chiocca had discussed his sex life with</p> <p>23 Ms. Birmingham, correct?</p> <p>24 MR. SHAFRAN: Objection.</p> <p>25 A That's correct, yes.</p>	<p>Page 51</p> <p>1 recall her name being mentioned.</p> <p>2 Q But nevertheless, when Ms. Birmingham</p> <p>3 called you, Ms. Birmingham had mentioned Ms. Hall's</p> <p>4 name, correct?</p> <p>5 A Correct.</p> <p>6 Q And Ms. Birmingham had also indicated to</p> <p>7 you that Mr. Chiocca had told her that he needed</p> <p>8 medication to engage in sexual relations, correct?</p> <p>9 MR. SHAFRAN: Objection.</p> <p>10 A Marcy did, yes.</p> <p>11 BY MS. CIESLAK:</p> <p>12 Q So, based on what Marcy had reported to</p> <p>13 you from Mr. Chiocca, you were able to conclude that</p> <p>14 something sexual in nature had occurred between</p> <p>15 Mr. Chiocca and Ms. Hall, right?</p> <p>16 MR. SHAFRAN: Objection.</p> <p>17 A That's what we were assuming, yeah.</p> <p>18 BY MS. CIESLAK:</p> <p>19 Q After May 18, 2018, did you speak with</p> <p>20 Mr. Chiocca again?</p> <p>21 A No.</p> <p>22 Q Did you have any text correspondence with</p> <p>23 him?</p> <p>24 A No.</p> <p>25 Q I'm going to show you Ms. Ryan's notes</p>
<p>Page 50</p> <p>1 BY MS. CIESLAK:</p> <p>2 Q And it's highly inappropriate for</p> <p>3 Mr. Chiocca to have discussed his sex life with his</p> <p>4 subordinate, Ms. Birmingham, correct?</p> <p>5 MR. SHAFRAN: Objection.</p> <p>6 A Yes, that's correct.</p> <p>7 BY MS. CIESLAK:</p> <p>8 Q Based on your conversation with</p> <p>9 Ms. Birmingham and your conversation with</p> <p>10 Mr. Chiocca, at that point in time you had</p> <p>11 understood that something sexual in nature had</p> <p>12 occurred between Mr. Chiocca and Ms. Hall, correct?</p> <p>13 MR. SHAFRAN: Objection.</p> <p>14 A I don't recall.</p> <p>15 BY MS. CIESLAK:</p> <p>16 Q Well, you had just indicated that</p> <p>17 Ms. Hall's name was mentioned by Mr. Chiocca, right?</p> <p>18 During the May 18th conversation?</p> <p>19 A Well, that was in the notes; but, I don't</p> <p>20 recall her name being mentioned.</p> <p>21 Q I'm sorry. I thought we had just gone</p> <p>22 over the notes and it did refresh your recollection</p> <p>23 that Ms. Hall's name was mentioned during that</p> <p>24 May 18th conversation with Mr. Chiocca.</p> <p>25 A No. I thought I said I didn't really</p>	<p>Page 52</p> <p>1 again, which we have marked as Exhibit 1.</p> <p>2 A Okay.</p> <p>3 Q I have scrolled to the bottom half of the</p> <p>4 first page of Exhibit 1. Can you read to yourself</p> <p>5 these notes that are appearing on your screen here?</p> <p>6 We had already discussed the notes that say "Friday</p> <p>7 night, 8:34 p.m." And so from when it says, "She</p> <p>8 called Ms. Birmingham," to the bottom. Let me know</p> <p>9 when you're finished.</p> <p>10 A Okay.</p> <p>11 Q After reading Ms. Ryan's notes, does it</p> <p>12 refresh your memory that by May 18, 2018, you knew</p> <p>13 what had happened between Mr. Chiocca and Ms. Hall</p> <p>14 was bad and that it had to do with Ms. Hall?</p> <p>15 MR. SHAFRAN: Objection.</p> <p>16 A Yes.</p> <p>17 BY MS. CIESLAK:</p> <p>18 Q And I believe I had asked you, Did you</p> <p>19 have any text correspondence with Mr. Chiocca</p> <p>20 following May 18th, and you had indicated no. Do</p> <p>21 these notes refresh your recollection as to whether</p> <p>22 or not there was any text correspondence between you</p> <p>23 and Mr. Chiocca?</p> <p>24 A Yes.</p> <p>25 Q Okay. What is your memory now regarding</p>

<p>Page 69</p> <p>1 to be alone with Ms. Hall, correct?</p> <p>2 MR. SHAFRAN: Objection.</p> <p>3 A Never once? Could you -- I don't</p> <p>4 understand the question.</p> <p>5 BY MS. CIESLAK:</p> <p>6 Q Sure. Following May 1, 2018, he never</p> <p>7 said to you that he doesn't want to be physically</p> <p>8 present with Ms. Hall, correct?</p> <p>9 MR. SHAFRAN: Objection.</p> <p>10 A Correct.</p> <p>11 Q Mr. Chiocca never expressed to you that he</p> <p>12 didn't want to be alone with Ms. Hall after May 1,</p> <p>13 2018, correct?</p> <p>14 MR. SHAFRAN: Objection.</p> <p>15 A Correct.</p> <p>16 BY MS. CIESLAK:</p> <p>17 Q I think talked about earlier that when you</p> <p>18 became the executive assistant to the board of</p> <p>19 selectmen and during your tenure as the executive</p> <p>20 assistant for the board of selectmen, you weren't</p> <p>21 friends with Mr. Chiocca, correct?</p> <p>22 A Right, we were not friends.</p> <p>23 Q You just are a professional working</p> <p>24 relationship, correct?</p> <p>25 A Yes, that's correct.</p>	<p>Page 71</p> <p>1 A I would call it -- yeah, it was -- Ed came</p> <p>2 into the office. So, yes, I'm sure I did.</p> <p>3 Q Do you recall what you said to him about</p> <p>4 how you felt if Mr. Chiocca were to return to work?</p> <p>5 A I recall having a conversation,</p> <p>6 Marcy Birmingham and I., I think we were just</p> <p>7 talking. I don't know exactly what was said.</p> <p>8 Q Did you ever express that you felt</p> <p>9 uncomfortable if he were to return to work?</p> <p>10 A Yes, I said that.</p> <p>11 Q Okay. Just so I completely understand it,</p> <p>12 you expressed to Mr. Kimball that you felt</p> <p>13 uncomfortable if Mr. Chiocca were to return to work?</p> <p>14 A That was probably part of that</p> <p>15 conversation, yes, with Marcy, yes.</p> <p>16 Q Okay. So you did say that?</p> <p>17 A As far as I can recall, yes.</p> <p>18 Q Okay. Was it your understanding at some</p> <p>19 point after the May 1st incident that Mr. Chiocca</p> <p>20 was placed on administrative leave?</p> <p>21 A After May 18th, yes.</p> <p>22 Q Okay. Do you know who wrote the notice</p> <p>23 placing Mr. Chiocca on administrative leave?</p> <p>24 A No, I do not know who wrote the letter.</p> <p>25 Q And you didn't witness who actually</p>
<p>Page 70</p> <p>1 Q So, you didn't necessarily feel that he</p> <p>2 had the liberty to call you, shit faced, on May 18,</p> <p>3 2018, while you were on vacation to tell you that</p> <p>4 something had occurred, correct?</p> <p>5 MR. SHAFRAN: Objection.</p> <p>6 A Yes, that's correct.</p> <p>7 BY MS. CIESLAK:</p> <p>8 Q And the fact that he broke those</p> <p>9 boundaries with you is one of the reasons that you</p> <p>10 did not feel comfortable for him to come back to</p> <p>11 town hall after the investigation, correct?</p> <p>12 MR. SHAFRAN: Objection.</p> <p>13 A Yes. That's correct.</p> <p>14 Q Okay. I have no further questions.</p> <p>15 CROSS EXAMINATION</p> <p>16 BY MS. DUNN:</p> <p>17 Q Can you hear me now?</p> <p>18 A Yes, I can.</p> <p>19 Q Good afternoon. I just have a few</p> <p>20 questions for you. I'm Attorney Tara Dunn. I'm</p> <p>21 representing Mr. Kimball.</p> <p>22 Ms. Ide, after you learned about the</p> <p>23 May 1st incident, did you speak with Mr. Kimball</p> <p>24 about how you felt about Mr. Chiocca returning to</p> <p>25 work?</p>	<p>Page 72</p> <p>1 drafted that letter?</p> <p>2 A No. I did not, no.</p> <p>3 Q So, Ms. Ryan's notes from your interview</p> <p>4 state that Mr. Kimball actually drafted that notice</p> <p>5 placing Mr. Chiocca on administrative leave. Do you</p> <p>6 remember seeing that?</p> <p>7 A I don't remember. I didn't see who wrote</p> <p>8 the letter.</p> <p>9 Q Okay. It would be fair to say that it is</p> <p>10 incorrect that Mr. Kimball -- strike that.</p> <p>11 It would be fair to say that you</p> <p>12 didn't tell Ms. Ryan that Mr. Kimball drafted the</p> <p>13 administrative leave letter?</p> <p>14 A I could have sent a draft. No, I don't</p> <p>15 recall. I don't recall.</p> <p>16 MS. DUNN: I have no further questions.</p> <p>17 MR. SHAFRAN: Do you have any, Ellen?</p> <p>18 MS. ZUCKER: Not at this moment. Why</p> <p>19 don't you go.</p> <p>20 MR. SHAFRAN: Sure.</p> <p>21 MR. AMOS: Let me pin you, Adam, just so</p> <p>22 she can see you.</p> <p>23 CROSS EXAMINATION</p> <p>24 BY MR. SHAFRAN:</p> <p>25 Q Good afternoon, Ms. Ide.</p>

<p>Page 113</p> <p>1 testified she remembers having numerous</p> <p>2 conversations with Stacy about town hall. We can</p> <p>3 have the court reporter read these questions back,</p> <p>4 but you are not entitled to ask the same question</p> <p>5 10 times in slightly different ways to confuse a</p> <p>6 witness into answering the way you want to. It's</p> <p>7 been asked and answered.</p> <p>8 MR. SHAFRAN: Okay. The transcript will</p> <p>9 certainly speak for itself.</p> <p>10 MR. AMOS: Move on to your next question.</p> <p>11 BY MR. SHAFRAN:</p> <p>12 Q When was the last time you spoke with</p> <p>13 Deirdre Hall?</p> <p>14 A Probably 2018.</p> <p>15 Q Okay.</p> <p>16 A Yeah. That's a guesstimate.</p> <p>17 Q Do you recall whether she was on the board</p> <p>18 or not, still at the time?</p> <p>19 A That would be the only time that I knew</p> <p>20 Deirdre Hall.</p> <p>21 Q So you have no recollection of speaking to</p> <p>22 her after she resigned from the board; is that</p> <p>23 correct?</p> <p>24 A Correct.</p> <p>25 Q Okay. Do you recall when the last time</p>	<p>Page 115</p> <p>1 out on vacation.</p> <p>2 Q Sometimes your email reply is called an</p> <p>3 out of office message?</p> <p>4 A Correct.</p> <p>5 Q Can you just read to me the first line of</p> <p>6 this document, which I'll mark as Exhibit 4?</p> <p>7 A I will be out of the office Monday May 14</p> <p>8 to Friday May 18, 2018.</p> <p>9 (Marked for identification, Defendant's</p> <p>10 Exhibit 4, 05-16-2018 email.)</p> <p>11 BY MS. CIESLAK:</p> <p>12 Q So Exhibit 4 completely confirms that you</p> <p>13 were on vacation from May 14 through May 18, 2018,</p> <p>14 correct?</p> <p>15 A Correct.</p> <p>16 Q I believe that you testified earlier that</p> <p>17 you were afraid to complain to Allan about his</p> <p>18 sexual comments around town hall because you were</p> <p>19 afraid of losing your job. That's accurate?</p> <p>20 A Correct.</p> <p>21 Q Is it fair to say that you were also</p> <p>22 afraid to report his sexual comments to others for</p> <p>23 fear that he would return to town hall after the</p> <p>24 investigation?</p> <p>25 MR. AMOS: Objection.</p>
<p>Page 114</p> <p>1 you spoke with Mr. Kimball was?</p> <p>2 A Probably when he was resigned from the</p> <p>3 board. I can't remember when he resigned from the</p> <p>4 board.</p> <p>5 MR. SHAFRAN: I have no further questions.</p> <p>6 Thank you.</p> <p>7 MS. CIESLAK: I do have five minutes.</p> <p>8 Maybe three minutes.</p> <p>9 MS. ZUCKER: I have some questions for</p> <p>10 follow-up too, Cindy. Why don't you go first.</p> <p>11 MS. CIESLAK: Ms. Ide, do you need a break</p> <p>12 at this time?</p> <p>13 No. I'm all set. Thank you.</p> <p>14 REDIRECT EXAMINATION</p> <p>15 BY MS. CIESLAK:</p> <p>16 Q I believe there was some prior questioning</p> <p>17 about when you were on vacation in May of 2018. I</p> <p>18 want to show you a document.</p> <p>19 MS. CIESLAK: For the record, I am sharing</p> <p>20 my screen. It's a document marked DHall707.</p> <p>21 BY MS. CIESLAK:</p> <p>22 Q Ms. Ide, can you take a look at this</p> <p>23 document and tell me what you recognize this</p> <p>24 document to be?</p> <p>25 A That looks like my email reply when I was</p>	<p>Page 116</p> <p>1 A I'm sorry, could you repeat that question?</p> <p>2 I got distracted.</p> <p>3 BY MS. CIESLAK:</p> <p>4 Q No problem.</p> <p>5 Is it fair to say that you were also</p> <p>6 afraid to report his sexual comments to others</p> <p>7 within town hall for fear that he was going to</p> <p>8 return to town hall after the investigation?</p> <p>9 A Yes, that's correct. That's correct.</p> <p>10 BY MS. CIESLAK:</p> <p>11 Q And you were afraid that he would</p> <p>12 retaliate against you if you spoke out against him</p> <p>13 in town hall; is that correct?</p> <p>14 MR. SHAFRAN: Objection.</p> <p>15 A Yes, that's correct.</p> <p>16 MS. CIESLAK: I have no further questions.</p> <p>17 CROSS EXAMINATION</p> <p>18 BY MS. ZUCKER:</p> <p>19 Q Good afternoon, Ms. Ide. My name is Ellen</p> <p>20 Zucker and I represent Ms. Hall and her</p> <p>21 counterclaim. It's good to meet you.</p> <p>22 A Same to you.</p> <p>23 Q I'm sorry this has been such a long day.</p> <p>24 I will try to keep it short. Maybe famous last</p> <p>25 words; but, let me do my best.</p>

<p>Page 125</p> <p>1 MR. AMOS: You can answer.</p> <p>2 A Yes, I think that's correct.</p> <p>3 BY MS. ZUCKER:</p> <p>4 Q So, when you spoke with others and you</p> <p>5 learned that he had shared even more intimate</p> <p>6 details about his sex life with others, that</p> <p>7 confirmed for you that this was a man who shouldn't</p> <p>8 be restored to his position as town administrator,</p> <p>9 isn't that right?</p> <p>10 MR. SHAFRAN: Objection.</p> <p>11 A Yes, I agree.</p> <p>12 BY MS. ZUCKER:</p> <p>13 Q By the way, you were a little afraid of</p> <p>14 him, weren't you?</p> <p>15 MR. SHAFRAN: Objection.</p> <p>16 A Yes I was. He intimidated me.</p> <p>17 BY MS. ZUCKER:</p> <p>18 Q And he's -- could you describe, just so</p> <p>19 that it's in the record, what you see of him today</p> <p>20 as you've tried to answer questions?</p> <p>21 MR. SHAFRAN: Objection.</p> <p>22 A What I think of him today?</p> <p>23 BY MS. ZUCKER:</p> <p>24 Q As you look on the screen, what do you</p> <p>25 see? Do you see his full face?</p>	<p>Page 127</p> <p>1 A That's correct.</p> <p>2 Q And you have a general memory, don't you,</p> <p>3 of having spoken to her on a series of subjects</p> <p>4 during the course of that discussion, right?</p> <p>5 A Yes.</p> <p>6 Q And your general memory -- you may not</p> <p>7 remember the exact words you used, although you</p> <p>8 certainly remember some of the events you described;</p> <p>9 isn't that right?</p> <p>10 A Yes, that's correct.</p> <p>11 Q And when you were asked by counsel for</p> <p>12 Mr. Chiocca to sort of go through the entire event,</p> <p>13 you indicated that you couldn't do that. Do you</p> <p>14 remember that?</p> <p>15 A Yes. Yes, and I apologize. I was --</p> <p>16 Q Why did you say that you couldn't kind of</p> <p>17 go from the beginning of the conversation to the end</p> <p>18 of the conversation giving him every detail in</p> <p>19 between?</p> <p>20 A I was just getting confused. I was</p> <p>21 feeling really intimidated and just really flustered</p> <p>22 and nervous. I'm nervous.</p> <p>23 Q Okay. So, can you say generally what that</p> <p>24 conversation with Ms. Ryan was about? Just give us</p> <p>25 your best general summary of what the conversation</p>
<p>Page 126</p> <p>1 A I'm trying not to. It's intimidating.</p> <p>2 I've lost total respect. It's very sad that this is</p> <p>3 what he's come down to.</p> <p>4 Q Even today, you see a shadow of his face,</p> <p>5 but you can't even see him, right?</p> <p>6 A Correct.</p> <p>7 MR. SHAFRAN: Objection.</p> <p>8 BY MS. ZUCKER:</p> <p>9 Q That's a little intimidating, isn't it?</p> <p>10 A Yes, it is.</p> <p>11 Q Has that made it difficult for you today?</p> <p>12 A Yes, it has.</p> <p>13 Q Now, you were asked a kind of confusing</p> <p>14 set of questions about what you remembered about</p> <p>15 your conversation with Regina Ryan. I just want to</p> <p>16 step back and see if I can just help to clarify</p> <p>17 that.</p> <p>18 MR. SHAFRAN: Objection.</p> <p>19 BY MS. ZUCKER:</p> <p>20 Q You met with Ms. Ryan; isn't that right?</p> <p>21 A Yes, that's correct.</p> <p>22 Q If I understand your testimony correctly,</p> <p>23 she asked you a series of questions, but you're not</p> <p>24 clear what the exact contour of each question was;</p> <p>25 is that right?</p>	<p>Page 128</p> <p>1 was about.</p> <p>2 A Well, I know she asked me about the</p> <p>3 October -- I'm sorry. May 18th phone call, about</p> <p>4 the mood, Allan's demeanor at town hall in general.</p> <p>5 I know I brought up, as we said, a comment he made</p> <p>6 about Marcy and I, scissor sisters. I do remember</p> <p>7 that.</p> <p>8 Q Did looking at notes help you remember --</p> <p>9 refresh your memory when you were looking at them?</p> <p>10 A Yes. A little bit, Yes.</p> <p>11 Q Okay. Do you remember that you -- just</p> <p>12 anything else you generally remember without</p> <p>13 reference to any notes that can refresh your memory</p> <p>14 more specifically? Anything else you generally</p> <p>15 remember about that conversation? Take your time.</p> <p>16 A I know. I'm sorry.</p> <p>17 Q No, no. Don't apologize. This is hard.</p> <p>18 A Yeah no. I'm sorry.</p> <p>19 Q Okay. Do you remember you were asked</p> <p>20 about whether you've described -- whether you</p> <p>21 described to Ms. Ryan that you had a very good</p> <p>22 relationship with Mr. Chiocca?</p> <p>23 A Right.</p> <p>24 Q Right?</p> <p>25 A Yes.</p>

<p>Page 137</p> <p>1 agenda up.</p> <p>2 Q Okay. So, Mr. Chiocca acted as though he</p> <p>3 was, you know, the overseer of the board, not</p> <p>4 someone who was controlled by them; is that fair?</p> <p>5 MR. SHAFRAN: Objection.</p> <p>6 A That's correct.</p> <p>7 MS. ZUCKER: I have no further questions.</p> <p>8 MR. SHAFRAN: I have no further questions,</p> <p>9 either.</p> <p>10 MR. AMOS: Can we just take a two-minute</p> <p>11 break for me to look at my notes real quick?</p> <p>12 (Recessed from 2:29 p.m. until 2:33 p.m.)</p> <p>13 CROSS EXAMINATION</p> <p>14 BY MR. AMOS:</p> <p>15 Q Sue, I just have a couple questions for</p> <p>16 you.</p> <p>17 Did you at some point see</p> <p>18 Regina Ryan's investigative report?</p> <p>19 A Yes, I did.</p> <p>20 Q Did you read it?</p> <p>21 A Yes.</p> <p>22 Q And were there things that you told Regina</p> <p>23 during her interview of you that were not in the</p> <p>24 report?</p> <p>25 A Yes.</p>	<p>Page 139</p> <p>1 RECROSS EXAMINATION</p> <p>2 BY MR. SHAFRAN:</p> <p>3 Q Do You recall describing to Regina Ryan</p> <p>4 the atmosphere at town hall?</p> <p>5 A I believe I did, yes.</p> <p>6 MR. SHAFRAN: Okay. I have no further</p> <p>7 questions.</p> <p>8 (Concluded at 2:35 p.m.)</p>
<p>Page 138</p> <p>1 MR. SHAFRAN: Objection.</p> <p>2 MR. AMOS: What's the objection?</p> <p>3 MR. SHAFRAN: It's on objection as to the</p> <p>4 form of the question.</p> <p>5 MR. AMOS: What part of the form? To see</p> <p>6 if I need to rephrase it?</p> <p>7 MR. SHAFRAN: You're asking entirely</p> <p>8 leading questions and she's not an adverse party or</p> <p>9 a hostile witness.</p> <p>10 MR. AMOS: Well, my question wasn't</p> <p>11 leading so I won't rephrase.</p> <p>12 BY MR. AMOS:</p> <p>13 Q Ms. Ide, can you recall any of the things</p> <p>14 that you told Ms. Ryan in the interview that were</p> <p>15 not in the report?</p> <p>16 A I know my comment, scissor sisters, was</p> <p>17 not in there, and I know I made that comment to</p> <p>18 Regina Ryan.</p> <p>19 I don't recall seeing my comments</p> <p>20 about the atmosphere at town hall being in there. I</p> <p>21 think that's -- yeah, I can't remember.</p> <p>22 MR. AMOS: I have no other questions.</p> <p>23 MR. SHAFRAN: I just have one question.</p>	<p>Page 140</p> <p>1 CERTIFICATE OF DEPONENT</p> <p>2</p> <p>3 I, SUSAN IDE, have read the</p> <p>4 foregoing transcript of the testimony given at the</p> <p>5 deposition on October 0, 2021, and it is true and</p> <p>6 accurate to the best of my knowledge as originally</p> <p>7 transcribed and/or with the changes as noted on the</p> <p>8 attached Errata Sheet.</p> <p>9</p> <p>10</p> <p>11</p> <p>12 _____</p> <p>13 SUSAN IDE</p> <p>14</p> <p>15 Subscribed and sworn to before me this _____</p> <p>16 day of _____, 2021</p> <p>17</p> <p>18</p> <p>19 _____</p> <p>20 My commission expires: Notary Public</p> <p>21</p> <p>22</p> <p>23</p> <p>24 CHIOCCA ROCKLAND</p> <p>25 SUSAN IDE - October 1, 2021</p> <p>(klv)</p>